REMARKS

Claims 1, 6-10, 12-13, 25, 44 and 47-56 were previously pending in this application. Claims 19-24 and 35-40 have been previously withdrawn. Claims 2-5, 11, 14-18, 26-34, 42-43 and 45-46 have been canceled without prejudice or disclaimer. Claims 1 and 25 have been amended. No new matter has been added. Applicants respectfully request reconsideration of the application in view of the foregoing amendments and the following remarks.

Claim Rejections – 35 U.S.C. § 102

Claims 1, 6-10, 12-13, 25, 44 and 47-56 have been rejected under 35 U.S.C. § 102(b) as being anticipated by Clitheros et al., US Patent No. 4,564,410. Applicants respectfully submit that the pending claims are patentably distinct from the cited reference.

Amended independent claim 1 recites, inter alia:

> An apparatus for processing a portion . . . comprising:
>
> * * *
>
> a supporting device movably supporting the processing device, wherein the supporting device includes a slidably supported structure, wherein the slidably supported structure is in exclusively slidable engagement with the supporting device and is free to move in a widthwise direction of the automobile body relative to the automobile body,_wherein such movement of the slidably supported structure is solely and directly in response to movement of the processing device along the concave portion, and
>
> * * *
>
> wherein the processing head moves in the substantially longitudinal direction relative to and along the concave portion, while the processing head moves in the widthwise direction in response to the tip contacting either of the side

> walls of the concave portion when the slidably supported structure is moved relative to the automobile body by the longitudinal drive device.

Applicants submit that Clitheros et al. cannot anticipate amended independent claim 1 because it does not teach each and every element of this claim. See MPEP § 2131. Specifically, Clitheros et al. do not teach, suggest or disclose an apparatus whereby movement of the slidably support structure relative to the supporting device is to due exclusively to a sliding engagement and in sole response to the tip of the processing head contacting the side walls of the concave portion as the slidably supported structure is moved by the longitudinal drive device.

The June 24, 2005 Office Action suggests that Clitheros et al. disclose a processing device movably supported by a supporting device, "wherein the supporting device includes a slidably supported structure" that "is free to move in a widthwise direction of the automobile body relative to the automobile body . . . ." See Office Action, pp. 2-3. Apparent from Figures 2 and 3, and as explained in the Specification, Clitheros et al. imparts motion to nozzle (16) in the widthwise direction using the combination of guide rail (30) and screw-threaded guide rail (32). See Clitheros et al., col. 4, lines 41-59. Notably, the physical engagement between guide rails (30, 32) and support block (28) is not exclusively slidable. Rather, support block (28) is threadably engaged with screw-threaded guide rail (32), such that nozzle 16 will move in a widthwise direction only if guide rail (32) is rotatably driven. Thus, even if support block (28) were considered "free to move," as characterized by the Examiner, such movement would be conditioned upon rotation of guide rail (32). See Office Action, p. 3.

Moreover, the Office Action states that "[t]he processing head of Clitheros [et al.] is considered capable of moving 'in the widthwise direction through contact of the tip with either of the side walls' via control of the motors." See Office Action, pp. 8-9. However, claim 1 of Clitheros et al. explains:

> a computer numerical control system connected to . . . said drive means, said computer numerical control system being operable by a ***predetermined program*** to exert full

> automatic control over . . . the drive means so that, when the apparatus is in operation, . . . the nozzle . . . is caused to accurately follow said periphery . . . See Clitheros et al., col. 13, lines 65-68; col. 14, lines 1-7.

Thus, movement of the nozzle (16) in Clitheros et al. is determined, in advance, by a computer program, rather than being the result of continuous, instantaneous responses to contact made by nozzle (16). In fact, guide rail (32) of Clitheros et al. teaches away from moving the processing head through nozzle contact because the threaded engagement prohibits natural freedom of movement and prevents support block (28) from making unprogrammed adjustments in reaction to the contour of a path.

In sharp contrast, Applicants disclose a structure whereby movement of the slidably supported structure is premised solely upon the slidable engagement between the slidably supported structure and the supporting device and whereby movement of the processing device in a widthwise direction is determined entirely by the response of the tip of the processing head contacting the side walls of the concave portion as the slidably supported structure is moved longitudinally along the automobile body. Accordingly, Applicants' claimed structure for moving the processing head is patentably distinct from the structure disclosed in Clitheros et al.

For at least the above reasons, Applicants respectfully submit that Clitheros et al. do not teach or suggest each and every element recited in amended independent claim 1 and that amended independent claim 1 is patentably distinct from Clitheros et al. Further, Applicants submit that amended independent claim 25 is patentably distinct from Clitheros et al. for at least similar reasons. Also, Applicants submit that claims 6-10, 12-13, 44 and 47-56, which are directly or indirectly dependent on amended independent claims 1 or 25, are patentably distinct from Clitheros et al. for at least similar reasons. Applicants respectfully request withdrawal of this ground of rejection.

CONCLUSION

Based on the foregoing amendments and remarks, Applicants respectfully request reconsideration and withdrawal of the rejection of claims and allowance of this application.

Respectfully submitted,
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Dated: September 22, 2005

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